IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

MICHAEL L. SHAKMAN, et al.,)
Plaintiffs,)
v.)
DEMOCRATIC ORGANIZATION OF COOK) Case No. 69-2145)
COUNTY, et al.,) Judge Edmond E. Chang)
Defendants)

GOVERNOR'S MOTION TO VACATE MAY 5, 1972 CONSENT DECREE

JB Pritzker, in his official capacity as Governor of the State of Illinois, by his attorney, Kwame Raoul, Attorney General of Illinois, moves this Court, pursuant to Federal Rule of Civil Procedure 60(b), to vacate the consent decree entered on May 5, 1972. The Governor will be filing a memorandum in support of this motion, which will be incorporated herein. Because the memorandum is longer than 15 pages, it will be filed as Exhibit 1 to the Governor's Motion for Leave to File Oversized Briefs *Instanter*, which will be filed after this motion to vacate is filed.

Governor's counsel asked plaintiffs' counsel whether they objected to this motion to vacate the decree. Plaintiffs' counsel stated that they do contest the Governor's Rule 60(b) motion.

WHEREFORE, for the foregoing reasons, the Governor respectfully requests that this Court, pursuant to Federal Rule of Civil Procedure 60(b), vacate the May 5, 1972 consent decree.

July 13, 2020

Respectfully Submitted,

KWAME RAOUL Illinois Attorney General JB Pritzker, in his official capacity as the Governor of the State of Illinois

By: /s/ Brent D. Stratton

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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that, on July 13, 2020, he caused to be filed through the Court's CM/ECF system a copy of Governor's Motion to Vacate May 5, 1972 Consent Decree. Parties of record may obtain a copy of this filing through the Court's CM/ECF system.

/s/ Brent D. Stratton

Brent D. Stratton